

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BRICKLAYERS' & ALLIED
CRAFTWORKERS LOCAL #2 ALBANY,
NY PENSION FUND, Individually and on
behalf of all others similarly situated,

Plaintiff,

v.

NEW ORIENTAL EDUCATION &
TECHNOLOGY GROUP INC.,
CHENGGANG ZHOU, MICHAEL
MINHONG YU and ZHIHUI YANG,

Defendants.

Case No.: 1:22-cv-01014-VM

Hon. Victor Marrero

ANDRES MIJARES-ORTEGA, Individually
and on behalf of all others similarly situated,

Plaintiff,

v.

NEW ORIENTAL EDUCATION &
TECHNOLOGY GROUP INC.,
CHENGGANG ZHOU, MICHAEL
MINHONG YU and ZHIHUI YANG,

Defendants.

Case No.: 1:22-cv-01876-VM

Hon. Victor Marrero

**NOTICE OF MOTION OF POTRERO LLC FOR CONSOLIDATION OF THE
ACTIONS, APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL
OF SELECTION OF COUNSEL**

**TO THE CLERK OF THE COURT, ALL PARTIES AND THEIR RESPECTIVE
ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Potrero LLC ("Potrero") respectfully moves this Court for
an order: (1) consolidating the above-captioned actions (the "Actions"); (2) appointing Potrero as
Lead Plaintiff pursuant to § 21D of the Securities Exchange Act of 1934 ("Exchange Act"), as

amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”); and (3) approving Potrero’s selection of Levi & Korsinsky, LLP as Lead Counsel for the Class.

Potrero seeks consolidation of the Actions, appointment as lead plaintiff, and approval of its choice of counsel pursuant to the Exchange Act, the Federal Rules of Civil Procedure, and the PSLRA. This motion is based on this notice, the attached Memorandum of Law, the Declaration of Adam M. Apton in support thereof, and the Court’s complete files and records in this action, as well as such further argument as the Court may allow at a hearing on this motion.

Dated: April 5, 2022

Respectfully Submitted,

LEVI & KORSINSKY, LLP

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*Lead Counsel for Potrero LLC and
[Proposed] Lead Counsel for the Class*